

11/18/83
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17 Church of Scientology of California

18 UNITED STATES DISTRICT COURT
19 CENTRAL DISTRICT OF CALIFORNIA

20 JANE LEE PETERSON and)
21 RICHARD J. PETERSON,) Civil No. 81-3259-CBM (KX)
22 Plaintiffs,)
23 v.) MEMORANDUM IN SUPPORT OF
24 CHURCH OF SCIENTOLOGY OF) DEFENDANTS' MOTION FOR
25 CALIFORNIA, et al.,) SUMMARY JUDGMENT
26 Defendants.)
27 _____) DATE: February 7, 1983
28) TIME: 10:00 a.m.
29) COURTRoom: Judge Marshall

30 CAROL A. GARRITY AND PAUL) Civil No. 81-3260-CBM
31 GARRITY,)
32 Plaintiffs,)
33 v.)
34 CHURCH OF SCIENTOLOGY OF)
35 CALIFORNIA, et al.,)
36 Defendants.)
37 _____)

1 THOMAS JEFFERSON,) Civil No. 81-3261-CBM
2 Plaintiff,)
3 v.)
4 CHURCH OF SCIENTOLOGY OF)
5 CALIFORNIA, et al.,)
6 Defendants.)
7 _____
8 DANA LOCKWOOD,) Civil No. 81-4109-CBM
9 Plaintiff,)
10 v.)
11 CHURCH OF SCIENTOLOGY OF)
12 CALIFORNIA, et al.,)
13 Defendants.)
14 _____
15 CHURCH OF SCIENTOLOGY OF)
16 CALIFORNIA,)
17 MICHAEL FLYNN, THOMAS HOFFMAN,)
18 THOMAS GREENE, KEVIN FLYNN,)
19 Counterclaimant)
20 Plaintiff,)
21 v.)
22 MICHAEL FLYNN, THOMAS HOFFMAN,)
23 THOMAS GREENE, KEVIN FLYNN,)
24 Counterclaimant)
25 Defendants.)
26 _____
27
28

1 "Q. By that mean you mean yes; the answer is yes?

2 "A. Sure. This guy would lay down his life for
3 LRH [L. Ron Hubbard]: no doubt in my mind."

4

5 (Exhibit "A", p. 11, l. 24 - p. 12, l. 2.)

6 Mr. Peterson stated that other Scientologists, other
7 than Mr. Harvey, also made some of the representations which he
8 has alleged were false. These individuals included Lee
9 Landers, Meryl Woodruff, Steve Thompson and Blank Silverman.
10 (Exhibit "A", pp. 13-18.) With regard to the individuals
11 making these representations, Mr. Peterson testified:

12

13 "Q. Did you believe these representations --

14 "A. Sure.

15 "Q. -- at the time they were made to you?

16 "A. Sure, I believed them.

17 "Q. The people who were making them to you, were
18 they sincere that --

19 "A. You better believe they were. I don't think
20 -- I don't think I have met, excluding a couple of
21 G.O. members -- and most of the G.O. members are
22 honest, ethical people. They think they are doing
23 the right thing. Most of them are the most
24 wonderful people I have met. They are very nice,
25 polite. They don't commit crimes. They don't
harm you. It is a very ethical group."

27 (Exhibit "A", p. 18, ll. 2-14.)

28 //

1 Mr. Peterson testified later in his deposition as
2 follows:

3
4 "Q. The people you had contact with were all
5 sincere in the representations they made to you?

6 "A. As far as I know, yes.

7 "Q. The people on up the line you didn't know
8 because you didn't have contact with them; is that
9 what you mean?

10 "A. Exactly."

11 (Exhibit "A", p. 20, ll. 12-17.)

12
13 3. The Testimony of Jane Lee Peterson.

14
15 Concerning her allegations of fraud, Plaintiff Jane
16 Peterson similarly testified as follows at her deposition:

17
18 "Q. Let me ask you a different question. The
19 people who you listed -- Mr. Landers, Woodruff,
20 Hammond, Harvey, and Mary Gay and so on -- who
21 made the representations to you that if you got
22 into Scientology you'd get these various benefits
23 -- did they seem sincere to you at the time that
24 they made these representations?

25 "A. Do you mean at the time did I think they were
26 sincere?

27 "Q. Well, that's a good question. Let's start
28 with that one.